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October 2, 2024

VIA ECF:

Hon. Sarah Netburn
 United States Courthouse
 Southern District of New York
 500 Pearl St.
 New York, NY 10007-1312

RE: MOTA et al. v. ARMELLINI EXPRESS LINES, et al.
Case No.: 1:22-cv-02807-SN
Joint Status Report
Motion for Leave to File Motion to Preclude Testimony by Defendant-Driver,
Daniel Hue

Dear Honorable Netburn:

Please allow this letter to serve as a joint status report on behalf of the parties pursuant to the *Order* dated September 30, 2024 (Doc. No. 46) in the above-referenced matter.

Plaintiffs intend on filing a motion for summary judgment, and as such, Plaintiffs respectfully request leave to file a motion to preclude testimony by the Defendant-driver, Daniel Hue, on the issue of liability and summary judgment based upon such preclusion.

The Plaintiff respectfully request that they be permitted to prepare a formal motion in limine/preclude on papers in connection herewith.

The parties propose the following briefing schedule:

- Motion to preclude/motion for summary judgment to be filed on or before November 1, 2024;
- Opposition, if any, to motion to preclude/motion for summary judgment to be filed on or before November 22, 2024;
- Reply to Opposition to motion to preclude/motion for summary judgment, if any, to be filed on or before November 29, 2024;

This Joint Status Report is being e-filed on consent of the parties.

Thank you for your attention to this matter.

Respectfully,

James L. Forde

JAMES L. FORDE, Esq.

cc. via email & ECF:

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